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July 16, 1999

BRITISH-BORNEO
EXPLORATION, INC.

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30 CFR 250

Minerals Management Service Proposed Rule
Training of Lessee and Contractor Employees
Engaged in Oil and Gas and Sulphur Operation
In the Outer Continental Shelf (OCS)
64 Federal Register 19318, April 20, 1999

Department of the Interior
Minerals Management Service
Mail Stop 4024
381 Elden Street
Herndon, Virginia 20170-4817

Attention: Rules Processing Team

Dear Sir:

British-Borneo Exploration, Inc. ("British-Borneo") appreciates the opportunity to comment on the subject Notice of Proposed Rulemaking. British-Borneo supports the MMS initiative to further address development of a performance based training system that affords lessees flexibility in the training of lessee and contractor employees engaged in OCS operations.

British-Borneo is an independent oil and gas exploration company operating in the Gulf of Mexico. We have production on both the shelf and deep water areas of this province. We are members of the Offshore Operators Committee and fully endorse their comments on this matter.

British-Borneo supports the MMS's ongoing effort to simplify and provide more flexibility in the training regulations while continuing to ensure that offshore workers are properly trained and commends the MMS for conducting the June 10, 1999, workshop to provide an opportunity for the exchange and discussion of ideas concerning training. Having OCS operations conducted by well trained personnel is absolutely essential for safe operations and environmental protection. British-Borneo sees proper staffing of exploration and production activities as a fundamental requirement.

Nonetheless, British-Borneo believes the potentially expanded scope will increase the compliance and record keeping burden for both operators and the MMS. The requirement that all lessees develop a detailed training plan which includes training and job qualification requirements for each

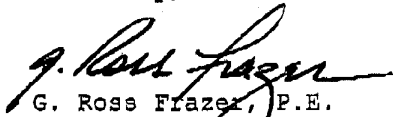
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position, for all employees, lessee or contractor, will result in a significant increase in administrative burden and thus costs.

In short, the current system appears to be working quite well. I would like to suggest that the MMS consider using its current system of performance reviews to encourage operators to enhance their training of personnel rather than a wholesale switch to requiring development of full-scale training programs from scratch.

Sincerely,



G. Ross Frazer, P.E.
Manager, Verification/Regulatory/HSE